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Attorney for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Pursuant to Local Rule IA 6-1, the parties hereby stipulate to an extension of time for the Defendants to respond to the First Amended Complaint filed on December 29, 2020. (ECF 31). This is the second request respecting the subject deadline.

The current deadline to respond to the First Amended Complaint is February 15, 2021. See Order (ECF 35). The parties had previously consulted on the original complaint in an attempt to limit the issues, claims, and parties before the Court, resulting in the First Amended Complaint. Plaintiff intends to file a separate, but related action against the United States in the coming weeks and to file a notice of related cases. The parties are still consulting on that separate complaint to again limit the issues and claims before the Court. Plaintiff circulated a proposed pleading two weeks ago and the parties held a lengthy meet and confer. The parties are close to finalizing an agreement. This request for an extension is for the purpose of allowing the parties to continue to meet and confer and to allow for the briefing on any motions to dismiss in both actions to follow the same schedule.

1 Accordingly, the parties respectfully request that the Defendants' response to the First
2 Amended Complaint, currently due by February 15, 2021, be extended until **March 15, 2021**.
3 This stipulation is not sought for purposes of delay or any other improper purpose.

4 Respectfully submitted this 8th day of February 2021.

<p>5 <i>/s/ Eugene Iredale</i> 6 EUGENE IREDALE 7 Iredale and Yoo, APC 8 105 West F Street, Fourth Floor San Diego, California 92101 (619) 233-1525 egiredale@iredalelaw.com</p> <p>9</p> <p>10 <i>/s/ Benjamin Durham</i> 11 BENJAMIN DURHAM Nevada Bar No. 7684 601 South 10th Street, Suite 101 Las Vegas, Nevada 89101 (702) 631-6111 bdurham@vegasdefense.com</p> <p>12</p> <p>13 Attorneys for Plaintiff</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p>	<p>BRIAN M. BOYNTON Acting Assistant Attorney General Civil Division</p> <p>C. SALVATORE D'ALESSIO, JR. Acting Director Torts Branch, Civil Division</p> <p>ANDREA W. MCCARTHY Senior Trial Counsel Torts Branch, Civil Division</p> <p><i>/s/ Siegmund F. Fuchs</i> SIEGMUND F. FUCHS Trial Attorney, Torts Branch D.C. Bar No. 986828 U.S. Department of Justice Ben Franklin Station P.O. Box 7146 Washington, D.C. 20044-7146 (202) 616-4322 siegmund.f.fuchs@usdoj.gov</p> <p>Attorneys for Defendants</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p>
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21 DATED: 2/16/2021

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE